



FEDERAL ELECTION COMMISSION

Washington, D.C. 20463

To: The Commission

Thomasenia P. Duncan
General Counsel

Ann Marie Terzaken
Associate General Counsel for Enforcement

From: Mark Allen *MA*
Assistant General Counsel

Michael A. Columbo *MAC*
Attorney

Subject: Pre-MUR 470/ [redacted] (National Republican Congressional Committee)

Re: Fast-Track Resolution

CELA

2018 APR 13 PM 4:38

RECEIVED
FEDERAL ELECTION
COMMISSION

Attached is a proposed fast-track conciliation agreement that has been signed by the Executive Director of the National Republican Congressional Committee (the "Committee"). Attachment. The agreement would settle the Committee's violations of 2 U.S.C. §§ 432(c) and 434(b) in connection with its failure to keep an account of and disclose its cash on hand and disbursements as a result of the embezzlement by its former treasurer, Christopher Ward, and its failure, unrelated to Ward's embezzlement, to accurately disclose its loan payments and debt.

Background

Pre-MUR 470 was initiated by a *sua sponte* submission ("Submission") filed with the Commission on behalf of the Committee. According to the Committee, Ward transferred a total of \$675,073.12 from the Committee to other committees without authorization and without disclosing the transactions to the Commission. [redacted]

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_____, we
circulated Pre-MUR 470, _____ GCR#2 recommending that the Commission find
reason to believe that the Committee violated the Act _____
_____ On January 12, 2010, the Commission did not vote on our
recommendations, but rather directed OGC to seek fast-track resolution of this matter.
See 72 Fed. Reg. 16,695, 16,698 (April 5, 2007).²

RECOMMENDATIONS:

1. Accept the attached fast-track conciliation agreement with the National Republican Congressional Committee and Keith Davis, in his official capacity as treasurer.
2. Approve the appropriate letter.
3. Close the file in Pre-MUR 470 _____

² Under the FTR process, the Commission will generally not make a reason-to-believe finding or open a formal investigation for respondents that self-report violations, if: (1) All potential respondents in a matter have joined in a self-reporting submission that acknowledges their respective violations of the Act; (2) those violations do not appear to be knowing and willful; (3) the submission is substantially complete and reasonably addresses the significant questions or issues related to the violation; and (4) the factual and legal issues are reasonably clear. 72 Fed. Reg. at 16,698.

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